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# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91192278
Party	Defendant Global Education Technologies, Inc.
Correspondence Address	Vincent M. Amberly Amberly Law 10805 Main Street, Suite 700 Fairfax, VA 22215-0035 UNITED STATES
Submission	Stipulated/Consent Motion to Extend
Filer's Name	VINCENT M AMBERLY
Filer's e-mail	vince@amberlylaw.com
Signature	/VMA/
Date	12/17/2009
Attachments	Motion w Consent for EOT discovery and trial dates.pdf ( 3 pages )(28218 bytes )

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Application of Serial No. 77/653862

ENRICH SOFTWARE CORP.,	
Opposer,	)
v.	) Opposition No. 91192278
GLOBAL EDUCATION TECHNOLOGIES, INC.,	)
Applicant.	, ) )

### MOTION WITH CONSENT FOR EXTENSION OF <u>DISCOVERY AND TRIAL PERIODS</u>

Applicant, GLOBAL EDUCATION TECHNOLOGIES, INC. ("Applicant"), through its undersigned counsel, AMBERLY LAW, respectfully moves the Board that the discovery period and all subsequent testimony periods in the above proceeding be extended for sixty (60) days.

Specifically, Applicant requests that the discovery and testimony periods be reset as follows:

Discovery Opens	February 23, 2010
Initial Disclosures Due	March 22, 2010
Expert Disclosures Due	July 22, 2010
Discovery Closes	August 21, 2010
Plaintiff's Pretrial Disclosures	October 5, 2010

November 19, 2010

Plaintiff's 30-day Trial Period Ends

Defendant's Pretrial Disclosures December 4, 2010

Defendant's 30-day Trial Period Ends January 18, 2011

Plaintiff's Rebuttal Disclosures February 3, 2011

Plaintiff's 15-day Rebuttal Period Ends March 2, 2011

The parties are presently discussing the possibility of settlement. The extension of the discovery and testimony periods is requested to allow additional time to negotiate a settlement without incurring unnecessary litigation expenses. Opposer's counsel, Theodore D. Lienesch, consented to this Motion during a telephone conversation today with Applicant's counsel.

Respectfully submitted,

#### **AMBERLY LAW**

Date: December 17, 2009 By: \_\_/Vincent M. Amberly/\_\_\_\_\_

Vincent M. Amberly

Amberly Law

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(703) 591-5180

Attorney for Applicants

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#### **CERTIFICATE OF SERVICE**

I certify that a true copy of the foregoing **MOTION WITH CONSENT FOR EXTENSION OF DISCOVERY AND TRIAL PERIODS** was sent via electronic mail to counsel for Opposer, Theodore D. Lienesch, Esq., Thompson Hine LLP, 2000 Courthouse Plaza NE, P.O. Box 8801, Dayton, Ohio 45401-8801, on this 17th day of December, 2009.

/Vincent M. Amberly/
Vincent M. Amberly